



Solutia Inc.
575 Maryville Centre Drive
St. Louis, Missouri 63141

May 8, 2002
(Via certified or express mail)

P.O. Box 66760
St. Louis, Missouri 63166-6760
Tel/ 314-674-1000

Kevin Turner-Environmental Scientist, OSC
U. S. Environmental Protection Agency
c/o Crab Orchard National Wildlife Refuge
8588 Rt. 148
Marion, IL 62959

Thomas Martin
Associate Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, IL 60604-3590

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)
Sediment / Soils Removal Action**
• # 12 - May 2002 Monthly Report

Dear Mr. Turner and Mr. Martin,

Enclosed is the May 2002 Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") sediment removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting.

Sincerely,

D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc:

Michael Ribordy - USEPA Region 5
Sauget File - Solutia
S. Bron - IEPA
Mayor D. Reed - Cahokia
Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)

Mike Henry - IDNR
Kevin de la Bruere - USF&G
Mayor P. Sauget - Sauget, IL

Sauget Sites Area I - Sauget, Illinois

May 31, 2000 UAO – Dead Creek Sediment Removal Action

Monthly Report

Date of Report: May 8, 2002
Period Covered: April 1, 2002 – April 30, 2002
Next Report Period: May 1, 2002 – May 31, 2002

Background

A Unilateral Administrative Order (“UAO”) was issued to Solutia by the U. S. EPA on May 31, 2000, requiring construction of an on-site containment cell, removal of affected creek bed sediments and soils and flood plain soils from specific sections of Dead Creek, and placement of the affected sediments and soils in the newly constructed on-site cell. A Time Critical Removal Action Work Plan (“TCRAWP”) was initially submitted to the Agencies June 30, 2000 for review and approval. Agreements sufficient to proceed with issuance of a request for bids for the containment cell construction were reached in December, 2000. Bids were received in late January and evaluated in February 2001.

Fieldwork began on the sediment de-watering phase of the project in November 2000. Installation of the required facilities (piping, pumps, basins, etc.) to de-water the sediments while the containment cell is being constructed was completed and started up in February, 2001. Operation of these facilities will continue until all sediments are placed into the containment cell.

Subject to the inclusion of all comments and agreed upon revisions, approval of the containment cell design by U. S. EPA was received March 5, 2001. A contract for construction of the containment cell was awarded March 8, 2001 to LMS Environmental Contracting, Inc. (“LMS”). Placement of fill for the Containment Cell berms began April 23, 2001. A March 30, 2001 revised draft containment cell design was approved by the Agencies in a May 10, 2001 letter. Construction was completed on the Containment Cell on September 13, 2001. A draft Containment Cell Certification Report was submitted for Agencies’ review and approval upon construction completion. The Containment Cell was approved on September 24, 2001 by USEPA and IEPA for receipt of sediment. Placement of sediments into the cell began September 26, 2001.

An Amendment to the UAO was received October 29, 2001. The Amendment modified the project scope of the UAO – adding Creek Sector F sediments removal and placement into the Containment Cell. On August 20, 2001, Solutia requested a change in the Post

Removal Confirmation Sampling and analytical protocols. In a November 30, 2001 communication, the Agency responded with revised sampling and analytical protocols.

Agency Actions / Communications

- Revision 01 Draft Groundwater Monitoring Plan - submitted to the Agencies August 3, 2001 – remained under review.
- The Operations and Maintenance Report - submitted for Agencies' review and approval August 28, 2001- remained under review. Portions of the Plan applicable to the placement of sediments have already been approved.

Work Performed during the reporting period

- Performed weekly inspection of the site.
- Maintained operation of the 50-gpm stormwater treatment system.
- Inspected and maintained the 6oz. Geotextile/6 mil scrim reinforced poly cover over containment cell.
- Maintained stormwater & leachate collection controls around the containment cell.
- Monitored support area facilities.
- Continued processing post sediment excavation sample results.
- Preparing risk assessments utilizing the results from the post sediments removal creek bottom sampling.

Data Submittal

No data is submitted with this report.

Work scheduled for next reporting period

- Conduct routine inspection of the containment cell.
- Continue operation of the 50-gpm stormwater treatment system.
- Perform necessary operation and maintenance on the containment cell and temporary treatment system.
- Continue preparation of the risk assessments utilizing the results from the post sediments removal creek bottom sampling.

PROJECT COMPLETION

Mobilization	100 %
Berm Construction	100 %
Liner Installation	100 %
Sediment Removal Preparation	100 %
Sediment Excavation (Site M)	100 %
Sediment Excavation (Original Scope of Work)	100 %
Sediment Excavation (Sector F)	100 %
Temporary Cover installation	100 %
Demobilization - Phase I	100 %
Final Cover Installation	0 %
Demobilization - Phase II	0 %
Final Report Preparation	0 %

Problems and Solutions

None

Submittal Schedule Status

See attached UAO schedule

Issues under review

None

Comments

None

May 31 Sauget Area I UAO Sediment Removal Action

SCHEDULE

Deliverable	Description	Due Date
Issuance Date	Date UAO signed by Muno	31-May-00
Effective Date	10 business day after issuance	14-Jun-00
Notice of Intent to Comply	3 business days after effective date	19-Jun-00
Designation of Contractor and Project Coordinator	5 business days after effective date	21-Jun-00
Access	14 calendar days after effective date	28-Jun-00
Time Critical Removal Action Work Plan Submittal	15 business days after effective date	7-Jul-00
EPA Approval of TCRA W/P		May 10, 2001
Monthly Reports	Begin 30 calendar days after approval of TCRA W/P until completion	June 10, 2001
Final Report	60 Calendar days after completion of sediments and soils removal	
Mitigation Plan	60 Calendar days after completion of sediments and soils removal	